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Department of Energy
Richland Operations Office
P.O. Box 550
Richland, Washington 99352

99-TPD-164

APR 27 1999

Mr. M. A. Wilson, Program Manager
Nuclear Waste Program
State of Washington Department of Ecology
P.O. Box 47600
Olympia, Washington 98504

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JAN 24 2003
EDMC

Dear Mr. Wilson:

PROPOSED PLAN OF ACTION FOR THE 224-T FACILITY

The 224-T Facility consists of two contiguous entities. Transuranic Storage and Assay Facility (TRUSAF), which is a Resource Conservation and Recovery Act (RCRA) container storage unit, and the cell side which contains six nuclear process cells. The Hanford Facility RCRA Permit modification schedule requires submittal of a RCRA closure plan to the State of Washington Department of Ecology (Ecology) for TRUSAF by June 1, 1999. The process cell side was last entered and the doors sealed in 1985. Accurate documentation of the current state of the process cell side identifying what, if any, process chemicals, solutions, or wastes were left in the vessels, piping, or sumps is not sufficient, and funding is currently available only for surveillance and maintenance activities.

The Richland Operations Office (RL) has held several discussions with the Ecology Waste Management Project Manager, Moses Jaraysi, concerning the regulatory status and the potential path forward for the 224-T Facility. Discussion has centered on a proposal, to which both Ecology and RL have tentatively agreed to manage 224-T as a "key facility" under Section 8, "Facility Decommissioning Process," of the Hanford Federal Facility Agreement and Compliance Order (Tri-Party Agreement) instead of preparing a RCRA closure plan. This is proposed since the facility only poses a low risk to human health and the environment, and it is not consistent with Hanford clean-up priorities to spend resources at this time to close such a low risk facility.

During the course of FY 1999, RL will work to identify funding to characterize the process cell side of 224-T, develop a safety characterization plan, and establish Tri-Party Agreement milestones for tracking the 224-T Facility characterization and planning activities that will determine the scope of the Section 8 path forward. RL proposes that the agencies develop an Agreement in Principle to guide TPA negotiations by June 1999.

In FY 2000, RL plans to complete the characterization work, analyze the data, and develop a preliminary plan of action. Upon completion of the characterization work, a meeting is proposed to discuss with Ecology what management actions should be taken in regards to the 224-T Facility path forward.

Mr. M. A. Wilson
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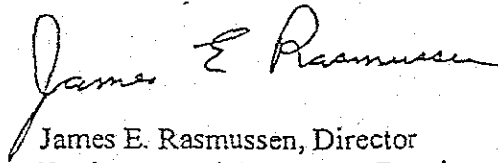
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We request your acceptance of removing TRUSAF from the requirements of a RCRA closure plan, and instead agree to develop Tri-Party Agreement characterization and planning milestones in addition to placing the entire facility under the Tri-Party Agreement Section 8 as a "key" facility.

We look forward to receiving your response to this letter and to working together to establish milestones for the 224-T Facility.

If you have any questions, please contact Loren E. Rogers of the Transition Program Division, on (509) 373-9560, or George H. Sanders of my staff, on (509) 376-6888.

Sincerely,



James E. Rasmussen, Director
Environmental Assurance, Permits,
and Policy Division

TPD:LER

cc: M. N. Jaraysi, Ecology
D. R. Sherwood, EPA
J. S. Hertz, FDH
A. M. Hopkins, FDH
R. E. Piippo, FDH